

BOIES SCHILLER FLEXNER LLP

David Boies (admitted *pro hac vice*)
333 Main Street
Armonk, NY 10504
Tel: (914) 749-8200
dboies@bsfllp.com

Mark C. Mao, CA Bar No. 236165
Beko Reblitz-Richardson, CA Bar No. 238027
Erika Nyborg-Burch, CA Bar No. 342125
44 Montgomery St., 41st Floor
San Francisco, CA 94104
Tel.: (415) 293-6800
mmao@bsfllp.com
brichardson@bsfllp.com
enyborg-burch@bsfllp.com

James Lee (admitted *pro hac vice*)
Rossana Baeza (admitted *pro hac vice*)
100 SE 2nd St., 28th Floor
Miami, FL 33131
Tel.: (305) 539-8400
jlee@bsfllp.com
rbaeza@bsfllp.com

Alison L. Anderson, CA Bar No. 275334
725 S Figueroa St., 31st Floor
Los Angeles, CA 90017
Tel.: (213) 995-5270
alanderson@bsfllp.com

Attorneys for Plaintiffs

SUSMAN GODFREY L.L.P.

Bill Carmody (admitted *pro hac vice*)
Shawn J. Rabin (admitted *pro hac vice*)
Steven M. Shepard (admitted *pro hac vice*)
Alexander Frawley (admitted *pro hac vice*)
1301 Avenue of the Americas, 32nd Floor
New York, NY 10019
Tel.: (212) 336-8330
bcarmody@susmangodfrey.com
srabin@susmangodfrey.com
sshepard@susmangodfrey.com
afrawley@susmangodfrey.com

Amanda K. Bonn, CA Bar No. 270891
1900 Avenue of the Stars, Suite 1400
Los Angeles, CA 90067
Tel: (310) 789-3100
abonn@susmangodfrey.com

MORGAN & MORGAN

John A. Yanchunis (admitted *pro hac vice*)
Ryan J. McGee (admitted *pro hac vice*)
201 N. Franklin Street, 7th Floor
Tampa, FL 33602
Tel.: (813) 223-5505
jyanchunis@forthepeople.com
rmcgee@forthepeople.com

Michael F. Ram, CA Bar No. 104805
711 Van Ness Ave, Suite 500
San Francisco, CA 94102
Tel: (415) 358-6913
mram@forthepeople.com

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No.: 4:20-cv-03664-YGR-SVK

**DECLARATION OF ROSSANA BAEZA
IN SUPPORT OF PLAINTIFFS'
RENEWED REQUEST TO DEPOSE
GOOGLE CEO SUNDAR PICHAI**

Magistrate Judge: Hon. Susan van Keulen

DECLARATION OF ROSSANA BAEZA

I, Rossana Baeza, declare as follows.

1. I am an associate with the law firm of Boies Schiller Flexner LLP, counsel for Plaintiffs in this matter. I am an attorney at law duly licensed to practice before all courts of the State of Florida, and admitted *pro hac vice* in this case (Dkt. 11). I have personal knowledge of the matters set forth herein and am competent to testify.

2. Attached as **Exhibit A** is a true and correct copy of a document produced by Google, Bates numbered GOOG-CABR-05468324.

3. Attached as **Exhibit B** is a true and correct copy of excerpts Defendant's Responses and Objections to Plaintiffs' Second Set of Requests for Production of Documents.

4. Attached as **Exhibit C** is a true and correct copy of excerpts of Defendant's Responses and Objections to Plaintiffs' Fifth Set of Requests for Production of Documents.

5. Attached as **Exhibit D** is a true and correct copy of excerpts of the June 30, 2022 deposition of Sabine Borsay.

6. Attached as **Exhibit E** is a true and correct copy of excerpts of the January 5, 2022 deposition of Christopher R. Palmer.

7. Attached as **Exhibit F** is a true and correct copy of excerpts of the November 16, 2021 deposition of Adrienne Porter Felt.

8. Attached as **Exhibit G** is a true and correct copy of a document produced by Google, Bates numbered GOOG-BRWN-00391231.

9. Attached as **Exhibit H** is a true and correct copy of a document produced by Google, Bates numbered GOOG-CABR-04971903.

10. Attached as **Exhibit I** is a true and correct copy of a document produced by Google, Bates numbered GOOG-CABR-04971904.

11. Attached as **Exhibit J** is a true and correct copy of a document produced by Google, Bates numbered GOOG-BRWN-00410878.

12. Attached as **Exhibit K** is a true and correct copy of excerpts of the June 29, 2022 deposition of Sabine Borsay.

13. Attached as **Exhibit L** is a true and correct copy of a document produced by Google, Bates numbered GOOG-CABR-04991831.

14. Attached as **Exhibit M** is a true and correct copy of a document produced by Google, Bates numbered GOOG-BRWN-00140297

15. Attached as **Exhibit N** is a true and correct copy of a document produced by Google, Bates numbered GOOG-CABR-05126022.

16. Attached as **Exhibit O** is a true and correct copy of a document produced by Google, Bates numbered GOOG-CABR-04675770.

17. Attached as **Exhibit P** is a true and correct copy of excerpts of the February 18, 2022 deposition of Rory McClelland.

18. Attached as **Exhibit Q** is a true and correct copy of excerpts of the November 24, 2021 deposition of AbdelKarim Mardini.

19. Attached as **Exhibit R** is a true and correct copy of excerpts of the February 8, 2022 deposition of Chetna Bindra.

20. Attached as **Exhibit S** is a true and correct copy of a document produced by Google, Bates numbered GOOG-BRWN-00388293.

21. Attached as **Exhibit T** is a true and correct copy of excerpts of the May 6, 2022 deposition of Lorraine Twohill.

22. Attached as **Exhibit U** is a true and correct copy of a document produced by Google, Bates numbered GOOG-BRWN-00048967.C.

23. Attached as **Exhibit V** is a true and correct copy of a document produced by Google, Bates numbered GOOG-CABR-00501220.

24. Attached as **Exhibit W** is a true and correct copy of excerpts of the January 18, 2022 deposition of Ramin Halavati.

26. Attached as **Exhibit Y** is a true and correct copy of a document produced by Google, Bates numbered GOOG-CABR-05756489.

27. Attached as **Exhibit Z** is a true and correct copy of a document produced by Google, Bates numbered GOOG-BRWN-00406065.

28. Attached as **Exhibit AA** is a true and correct copy of a document produced by Google, Bates numbered GOOG-BRWN-00226088.

29. Attached as **Exhibit BB** is a true and correct copy of a document produced by Google, Bates numbered GOOG-BRWN-00225677.

30. Attached as **Exhibit CC** is a true and correct copy of a document produced by Google, Bates numbered GOOG-BRWN-00474833.

31. Attached as **Exhibit DD** is a true and correct copy of excerpts the August 19, 2021 deposition of Brian Rakowski.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 21st day of July, 2022, in Miami, Florida.

/s/ Rossana Baeza
Rossana Baeza